

Serial No.: 09/820,589
Office Action Date: 10/06/2005

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REMARKS/ARGUMENTS

Subsequent to the Office Action issued on 10/06/2005, claims 1-3 are pending in the Application.

The Office Action rejected claims 1-3 under 35 U.S.C. § 102(e) as being anticipated by Bowman-Amuah, USPN 6,332,163 B1, hereafter "Bowman-Amuah".

Applicants respectfully traverse this rejection and request complete retraction thereof. As the examiner is likely well-aware, it is well settled that "[a]nticipation requires the disclosure in a single prior art reference of each element of the claim under consideration." *W.L. Gore & Assocs. v. Garlock, Inc.*, 220 USPQ 303, 313 (Fed. Cir. 1983), *cert. denied*, 469 U.S. 851 (1984). A prior art reference must disclose every limitation of the claimed invention, either explicitly or inherently, to anticipate. *In re Schreiber*, 128 F.3d 1473, 1477 (Fed. Cir. 1997). And, "[a]bsence from the reference of any claimed element negates anticipation." *Row v. Dror*, 42 USPQ 2d 1550, 1553 (Fed. Cir. 1997) (quoting *Kloster Speedsteel AB v. Crucible, Inc.*, 230 USPQ 81, 84 (Fed. Cir. 1986)).

If all the elements are not expressly stated in a single reference, a claim may only be anticipated if non-disclosed elements would have been inherent in the prior art. And, under the principles of inherency, the prior art must necessarily function in accordance with, or include the claim limitations, it anticipates. *Telemac Cellular Corporation v. Topp Telecom Inc.*, 247 F.3d 1316 (Fed. Cir. 2001) relying on *MEHL/Biophile Int'l Corp. v. Milgram*, 192 F.3d 1362, 1365 (Fed. Cir. 1999).

Claim 1 sets forth a process learning aid comprising, *inter alia*, an integrated tool including a model of a business process wherein the business process includes stages defined by a series of roles and tasks linked to an application system defined by an interface, content and scenarios wherein the business process defines the progression of information by the series of roles and tasks. The series of roles and tasks of the business process is supported by guidance from the integrated tool wherein selected portions of the integrated tool are accessed. Steps of the

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business process are identified and defined in the model. A scenario provides instruction through the content which defines the roles and demonstrates the actions necessary to complete the tasks through at least one of graphical, audio or textual materials via the interface.

Applicants respectfully traverse any rejection of claim 1 under 35 U.S.C. § 102(e) in view of *Bowman-Amuah* because *Bowman-Amuah* fails to teach or describe wherein a scenario provides instruction through the content which defines the roles and demonstrates the actions necessary to complete the tasks, as taught in claim 1.

As pointed out in the Office Action, *Bowman-Amuah* teaches a method for providing communications services over a computer network. As described in the specification, *Bowman-Amuah* teaches that workflow services control and coordinate the tasks that must be completed in order to process a business event. Workflow enables tasks within a business process to be passed among the appropriate participants in correct sequences, and facilitates their completion within set times and budgets, including actions required and work folders. (See, e.g., Col. 117, Line 51 – Col. 118, Line 3). Further, *Bowman-Amuah* provides a description of Active Help Services which enable an application to provide assistance to a user for a specific task or set of tasks, including help that is aware of the user's environment, process and context, and includes components for walking a user through a new process. (See Col. 104, Lines 43-54). However, even at this level of description and detail, *Bowman-Amuah* fails to teach or describe defining roles and demonstrating actions necessary to complete tasks, as claimed in claim 1.

Therefore, claim 1 is patentably distinguishable over *Bowman-Amuah*, and should be allowed to issue.

Claims 2 and 3 are patentably distinguishable over *Bowman-Amuah* for the same reasons as set forth with regard to claim 1, and therefore should be allowed to issue.

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Conclusion

Based on the above, it is respectfully submitted that Claims 1-3 are in condition for allowance and Applicants pray that same be allowed to proceed to issue. If the Examiner has any questions regarding the contents of the present response, Applicants' attorney may be reached at the phone number appearing below.

Respectfully submitted,



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